

The Honorable Robert S. Lasnik  
United States District Court Judge

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

MICHAEL MOI, an individual,

Plaintiff,  
v.

CHIHULY STUDIO, INC., a Washington  
corporation; DALE CHIHULY, individually  
and as a married person; LESLIE  
CHIHULY, individually and as a married  
person,

Defendants.

NO. 2:17-cv-00853

**PLAINTIFF'S RESPONSE TO  
DEFENDANTS' MOTION TO FILE  
DOCUMENT UNDER SEAL**

Plaintiff does not object to Defendants' motion to seal. As admitted in their motion to seal and as demonstrated by their motion to disqualify counsel, Defendants have filed information in breach of confidential settlement agreements. Those agreements do not permit disclosure except under limited circumstances. Those circumstances do not include filing such information in support of a motion to disqualify counsel. While certain redacted portions are not confidential or violative of the terms of any confidentiality agreements, out of an abundance of caution Plaintiff is not objecting to Defendants' request; there is no doubt that at least some of the content must be sealed in order to prevent Defendants' further breach of the confidentiality agreements. Plaintiff

{00280782;2}

PLAINTIFF'S RESPONSE TO DEFENDANTS'  
MOTION TO FILE DOCUMENT UNDER SEAL - 1

FREY BUCK, P.S.  
1200 FIFTH AVENUE, SUITE 1900  
SEATTLE, WA 98101  
P: (206) 486-8000 F: (206) 902-9660

1 does not waive the right, however, to request the Court unseal part of or all of the information at a  
2 later date if appropriate and consistent with this Court's earlier order granting Defendants' motion  
3 to seal portions of Plaintiff's complaint. *See Dkt. 32*, fn. 2.

4 DATED this 12th day of July, 2017, at Seattle, Washington.

5 **FREY BUCK, P.S.**

6 s/ Anne M. Bremner via ECF  
7 Anne M. Bremner, WSBA #13269  
8 Ted Buck, WSBA #22029  
9 Evan D. Bariault, WSBA #42867  
10 *Attorneys for Plaintiff*  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23

{00280782;2}

PLAINTIFF'S RESPONSE TO DEFENDANTS'  
MOTION TO FILE DOCUMENT UNDER SEAL - 2

FREY BUCK, P.S.  
1200 FIFTH AVENUE, SUITE 1900  
SEATTLE, WA 98101  
P: (206) 486-8000 F: (206) 902-9660

**Certificate of Service**

The undersigned certifies under the penalty of perjury according to the laws of the United States and the State of Washington that on this date I caused to be served in the manner noted below **PLAINTIFF'S RESPONSE TO DEFENDANTS' MOTION TO FILE DOCUMENT UNDER SEAL** on the following individuals:

Susan Foster  
Harry Schneider  
Perkins Coie  
1201 Third Avenue, Suite 4900  
Seattle, WA 98101  
(206) 359-8000  
[HSchneider@perkinscoie.com](mailto:HSchneider@perkinscoie.com)  
[SFoster@perkinscoie.com](mailto:SFoster@perkinscoie.com)  
*Attorneys for Defendants*

☐ Via Legal Messenger  
☐ Via US Mail  
☒ Via Email  
☒ Via ECF

DATED this 12th day of July, 2017, at Seattle, Washington.

s/ Lia Maria Fulgaro  
Lia Maria Fulgaro  
Paralegal

{00280782;2}

PLAINTIFF'S RESPONSE TO DEFENDANTS'  
MOTION TO FILE DOCUMENT UNDER SEAL - 3

FREY BUCK, P.S.  
1200 FIFTH AVENUE, SUITE 1900  
SEATTLE, WA 98101  
P: (206) 486-8000 F: (206) 902-9660